

JEFFREY F. BARR, ESQ.  
Nevada Bar No. 7269  
ARMSTRONG TEASDALE LLP  
3770 Howard Hughes Parkway, Suite 200  
Las Vegas, Nevada 89169  
Telephone: 702-678-5070  
Facsimile: 702-878-9995  
[jbarr@atllp.com](mailto:jbarr@atllp.com)

*Attorneys for Defendant  
Gravitas Nevada Ltd. d/b/a The Apothecarium*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DANIEL DRAPER, individually and on behalf of others similarly situated,

Case No.: 2:20-CV-01423-GMN-VCF

**Plaintiff,**

V.

RHMT, LLC. d/b/a THE APOTHECARIUM,  
et al.,

### Defendants.

**UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO  
ANSWER OR OTHER RESPONSIVE  
PLEADING ON BEHALF OF  
DEFENDANT GRAVITAS NEVADA LTD.  
d/b/a THE APOTHECARIUM  
AND [PROPOSED] ORDER**

Defendant Gravitas Nevada Ltd. d/b/a The Apothecarium (“Gravitas”), by and through counsel, moves the court for a fourteen-day extension of time to file an Answer or other responsive pleading to Plaintiffs’ Amended Complaint for Damages and Injunctive Relief Pursuant to the Telephone Consumer Protection Act, 47 U.S.C. § 227 et seq. (“Amended Complaint”) in the above-captioned case. In support of this unopposed Motion, Gravitas states:

1. Gravitas' current deadline to respond to the Amended Complaint is November 17, 2020.

2. This is the second extension sought by Gravitas.

111

111

3. Gravitas' counsel needs additional time to review and investigate the allegations in the Amended Complaint and attempt to resolve the purported dispute.

4. This motion is not made for purposes of hindrance or delay.

5. Plaintiff's counsel was consulted and does not oppose this motion for an additional fourteen-day extension for Gravitas to file an Answer or other responsive pleading to the Amended Complaint. If granted, Gravitas will have up to, and including, December 1, 2020, to file an Answer or other responsive pleading to the Amended Complaint.

WHEREFORE, Defendant Gravitas Nevada Ltd. d/b/a The Apothecarium requests that the Court enter an Order granting this unopposed Motion for an additional fourteen days to file an Answer or other responsive pleading to the Amended Complaint, and for any further relief the Court deems just and proper.

Dated: November 16, 2020.

## ARMSTRONG TEASDALE LLP

By: /s/ Jeffrey F. Barr  
JEFFREY F. BARR, ESQ.  
NV Bar No. 7269  
3770 Howard Hughes Parkway  
Suite 200  
Las Vegas, NV 89169

*Attorneys for Defendant  
Gravitas Nevada Ltd. d/b/a The  
Apothecarium*

## ORDER

IT IS SO ORDERED

Court Clerk  
UNITED STATES MAGISTRATE JUDGE  
DATED: 11-19-2020

## **CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5 (b), and section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of ARMSTRONG TEASDALE LLP, and that the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHER RESPONSIVE PLEADING ON BEHALF OF DEFENDANT GRAVITAS NEVADA LTD. D/B/A THE APOTHECARIUM AND ORDER was served:

- via electronic service to the address(es) shown below:

Gustavo@kazlg.com

*Counsel for Plaintiff Daniel Draper and the Putative Class*

- via the U.S. Postal Service at Las Vegas, Nevada, in a sealed envelope, with first-class postage prepaid, on the date and to the address(es) shown below:

Gustavo Ponce, Esq.  
KAZEROUNI LAW GROUP, APC  
6069 South Fort Apache Road, Suite 100  
Las Vegas, Nevada 89148

*Counsel for Plaintiff Daniel Draper and the Putative Class*

Date: November 16, 2020

/s/*Sheila A. Darling*

---

An employee of Armstrong Teasdale LLP